



CDSS

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STATE OF CALIFORNIA—HEALTH AND HUMAN SERVICES AGENCY
DEPARTMENT OF SOCIAL SERVICES
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EDMUND G. BROWN JR.
GOVERNOR

December 7, 2011

Pat Cheadle
Kern County Department of Human services
100 E. California Avenue
P.O. Box 511
Bakersfield, CA 93307

Dear Ms. Cheadle:

I want to take this opportunity to thank you and your staff for the cooperation and assistance provided the reviewer from our office during the course of the Civil Rights Compliance Review of June 24, 2011. Enclosed is the final report on the review. We apologize for the delay.

There are some compliance issues (deficiencies) identified in the report, which will require the development of a corrective action plan (CAP). Please submit your CAP within sixty days of this letter. Please address each deficiency and include steps and time lines for the completion of all corrective actions and recommendations listed in the attached report.

We will provide a copy of our report to any individual who makes a valid Public Records Act (PRA) request. Our reports are considered public documents under the PRA. Once we approve your CAP, it becomes a public document as well.

If you need technical assistance in the development of your CAP, please feel free to contact the Civil Rights Bureau at (916) 654-2107. You may also contact us by e-mail at crb@dss.ca.gov.

Sincerely,

JIM TASHIMA, Chief
Civil Rights Bureau
Human Rights and Community Services Division

Enclosure

c: Ginny Krebs, Civil Rights Coordinator

Linda Patterson, Branch Chief
CDSS CalFresh Program M.S. 8-9-32

Mike Papin, Chief
CalFresh Policy Bureau M.S. 8-9-32

Marlene Fleming, Chief
Field Operations Bureau M.S. 8-9-32

Brian Tam, Chief
CalFresh Management Operations Section M.S. 8-9-32

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CalFresh Policy Bureau M.S. 8-9-32

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Supplemental Nutrition Assistance Program (SNAP)
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Jodie Berger, Regional Counsel
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**CIVIL RIGHTS COMPLIANCE REVIEW REPORT
FOR
Kern County Department of Human Services
Conducted on June 21 – 24, 2011**

**California Department of Social Services
Human Rights and Community Services Division
Civil Rights Bureau
744 P Street, M.S. 8-16-70
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(916) 654-2107**

Reviewer

Cindy Guzman

TABLE OF CONTENTS

- I. INTRODUCTION
- II. SUMMARY OF METHODOLOGY
- III. DISSEMINATION OF INFORMATION
- IV. FACILITY ACCESSIBILITY FOR INDIVIDUALS WITH DISABILITIES
- V. PROVISION FOR SERVICES TO APPLICANTS AND RECIPIENTS WHO ARE NON-ENGLISH-SPEAKING OR WHO HAVE DISABILITIES
- VI. DOCUMENTATION OF APPLICANT/RECIPIENT CASE RECORDS
- VII. STAFF DEVELOPMENT AND TRAINING
- VIII. DISCRIMINATION COMPLAINT PROCEDURES
- IX. CIVIL RIGHTS COMPLIANCE PLAN REVIEW AND APPROVAL
- X. CONCLUSION

CIVIL RIGHTS COMPLIANCE REVIEW REPORT

I. INTRODUCTION

The purpose of this review by the California Department of Social Services (CDSS) Civil Rights Bureau (CRB) staff was to assess the Kern County Department of Human services with regard to its compliance with CDSS Manual of Policies and Procedures (MPP) Division 21 Regulations, and other applicable state and federal civil rights laws.

An on-site compliance review was conducted on June 21 - 24, 2011. An exit interview was held on June 24, 2011 to review the preliminary findings.

The review was conducted in the following locations:

Name of Facility	Address	Programs	Non-English languages spoken by a substantial number of clients (5% or more)
Shafter Office	115 Central Valley Hwy Shafter, CA 93263	CalFresh	Spanish
Ridgecrest Office	145 E. Ridgecrest Ridgecrest, CA 93555	Childrens' Services CalWORKS	Spanish
Bakersfield Office	100 E. California Ave. Bakersfield, CA 93307	CalFresh Childrens' Services	Spanish

II. SUMMARY OF METHODOLOGY

In preparing for this review, CDSS staff completed the following tasks:

- Reviewed the 2011 Civil Rights Compliance Plan submitted by the County.
- Reviewed the civil rights discrimination complaint database for a complete listing of complaints filed against the County for the last year.
- Reviewed the previous Compliance Reviews and Corrective Action Plans submitted by the county.

Headquarters and on-site review procedures included:

- Interviews of public contact staff
- Survey of program managers

- Case file reviews
- Facility inspections

Each site/program was reviewed for compliance in the following areas:

- Dissemination of Information
- Facility Accessibility for Individuals with Disabilities
- Bilingual Staffing/Services for Non-English-Speaking Clients
- Accessibility for Clients with Visual or Hearing Impairments
- Documentation of Client Case Records
- Staff Development and Training
- Discrimination Complaint Procedures

Here is a summary of the sources of information used for the review:

Interviews Conducted of Public Contact Staff

Classifications	Total	Bilingual
Eligibility Workers	12	5
Children Social Workers	2	1
Receptionist/Screeners	3	2
Total	17	8

Program Manager Surveys

Number of surveys distributed	1
Number of surveys received	5

Reviewed Case Files

English speakers' case files reviewed	7
Non-English or limited-English speakers' case files reviewed	53
Languages of clients' cases	Spanish, Mandarin (Chinese), Punjabi, Arabic, Laotian

Sections III through VIII of this report contain specific Division 21 civil rights requirements and present field review findings regarding the county's compliance with each requirement. The report format first summarizes each requirement, then the actual review team findings, including appropriate comparisons. This format is an effort to validate the application of policies and procedures contained in the annual plan. Required corrective actions are stated at the end of each section.

Section IX reviews the county's compliance plan, and provides either approval of the plan

as submitted, or lays out additional information to be submitted to gain approval.

Section X of the report is reserved for a declaration of overall compliance.

III. DISSEMINATION OF INFORMATION

Counties are required to disseminate information about program or program changes and about how applicants and recipients are protected by the CDSS regulations (Division 21). This dissemination should occur through outreach and information to all applicants, recipients, community organizations, and other interested persons, including non- and limited-English speakers and those with impaired hearing or vision or other disabling conditions.

A. Findings

Access to Services, Information and Outreach	Yes	No	Some-times	Comments
Does the county accommodate working clients by flexing their hours or allowing applications to be mailed in?	X			Office hours are 8 – 5. Accommodations can be arranged by appointment.
Does the county have extended hours to accommodate clients?	X			Extended hours to accommodate clients can be arranged by appointment.
Can applicants access services when they cannot go to the office?	X			Through mail, internet, mail boxes outside the office and through telephone.
Does the county ensure the awareness of available services for individuals in remote areas?	X			Through community based organizations.

Signage, posters, pamphlets	Yes	No	Some-times	Comments
Does the county use the CDSS pamphlet “Your Rights Under California Welfare Programs” (Pub 13)?			X	The Family Services Office at the 100 E. California Avenue Building in Bakersfield did not have the Pub 13 available in the

Signage, posters, pamphlets	Yes	No	Some-times	Comments
				lobby areas.
Is the pamphlet distributed and explained to each client at intake and re-certification?	X			
Is the current version of Pub 13 available in Arabic, Armenian Cambodian, Chinese, English, Farsi Hmong, Japanese, Korean, Lao Mien, Portuguese, Punjabi, Russian Spanish, Tagalog, Ukranian, Vietnamese?			X	The Family Services Office at the 100 E. California Avenue Building in Bakersfield did not have the Pub 13 available in the lobby areas.
If the PUB 13 is not displayed in all the languages available, is there a poster that indicates that the Pub 13 is available in all 18 languages?			X	The Family Services Office at the 100 E. California Avenue Building in Bakersfield did not have a poster indicating that the Pub 13 is available in all 18 languages.
Was the Pub 13 available in large print (English and Spanish), audiocassette and Braille?			X	The Family Services Office at the 100 E. California Avenue Building in Bakersfield did not have the Pub 13 available in large print (English and Spanish), audiocassette and Braille.
Were the current versions of the required posters present in the lobbies?			X	The Family Services Office at the 100 E. California Avenue Building in Bakersfield did not have the required posters present in the lobby area.
Did the workers know the location of the required posters with the Civil Rights Coordinator's name and address?	X			

Signage, posters, pamphlets	Yes	No	Some-times	Comments
Were there instructional and directional signs posted in waiting areas and other places frequented by a substantial number of non-English-speaking clients translated into appropriate languages?			X	145 E. Ridgecrest Mailbox signs "For DHS clients only – not for U.S. Mail" and door sign "P.C. 171B Prohibits possession of weapons" and sign "No smoking" are in English only.

B. Corrective Actions

Informational Element	Corrective Action Required
Distribution of CDSS' Pub 13	Kern County Department of Human Services shall ensure that the Pub 13 pamphlet, "Your Rights Under California Welfare Programs" is both given and explained to program participants in all of the programs for which CDSS has oversight responsibility. Div. 21-107.221
Translated Pub 13	Kern County Department of Human Services shall ensure that the current version of the Pub 13 is available in all languages translated by CDSS and that the available translated versions are given to the clients in their primary language. Div. 21-115.2
Auxiliary aids	Kern County Department of Human Services shall ensure the availability of large print, Braille, and auditory aids for participants in all of the programs for which CDSS has oversight responsibility. Div. 21-115.4
Posters	Kern County Department of Human Services shall ensure that the most current version of posters on nondiscrimination provided by CDSS and USDA are prominently displayed in all waiting areas and reception rooms. Div. 21-107.211

Informational Element	Corrective Action Required
Informational and Directional Signage	Directional and informational Signage is to be made available in threshold languages. Div 21.107-212

The county is required to use the latest version of each of the referenced documents. For your information, the most recent version for each of the above referenced documents is:

Pub 13	"Your Rights under California Welfare Programs"	6/11
Pub 86	"Everyone is Different, but Equal Under the Law"	03/07
Form AD 475B	"And Justice for All"	12/99

Contact the Civil Rights Bureau to receive the most recent versions, or download the Pub 13 from the CRB website http://www.dss.cahwnet.gov/civilrights/YourRights_498.htm.

IV. FACILITY ACCESSIBILITY FOR INDIVIDUALS WITH DISABILITIES

The Americans with Disabilities Act (ADA) requires public accommodations to provide goods and services to people with disabilities on an equal basis with the rest of the general public. The goal is to afford every individual the opportunity to benefit from the services available. The federal regulations require that architectural and communication barriers that are structural must be removed in public areas of existing facilities when their removal is readily achievable; in other words, easily accomplished and able to be carried out without much difficulty or expense.

The facility review is based on four priorities supported by the ADA regulations for planning achievable barrier removal projects. The priorities include ensuring accessible approach and entrance to the facility, access to goods and services, access to restrooms, and any other measures necessary.

Note that the references to the Americans with Disabilities Act Accessibility Guidelines (ADAAG) in the Corrective Action column refer to the federal Standards for Design. Title 24 of California Code and Regulations (T24 CCR) is also cited because there are instances when California state law is stricter than ADAAG specifications.

The county must ensure that programs and activities are readily accessible to individuals with disabilities. This includes building accessibility and availability of accessible parking as well as accessibility of public telephones and restrooms.

Regulations cited are from the Title 24, California Code of Regulations (T24 CCR) and ADAAG.

A. Findings and Corrective Actions

Facility Location: 115 Central Valley Hwy., Shafter, CA 93263

Facility Element	Findings	Corrective Action
Parking	<p>All accessible parking signs are missing the additional symbol sign "Minimum Fine \$250.00."</p> <p>Freestanding sign height is too low. (2) Low at 76", and (3) Low at 79".</p> <p>Access aisle right of door is missing the "No Parking" painted on pavement.</p>	<p>For both posted and wall-mounted signage, additional language on symbol sign and an additional sign below the symbol sign shall state "Minimum Fine \$250.00." (CA T24 1129B.4.1) p 133</p> <p>Sign height shall be 80" minimum from bottom of sign to top of finish grade. (CA T24 1129B.4.1, ADA 4.6.5) p. 134</p> <p>The words "NO PARKING" shall be painted on the ground in each 5' or 8' loading and unloading access aisle in white letters no smaller than 12". (CA T24 1129B.3.2) p. 135</p>
Entrance	Front double door	Force to open doors, exterior

	pressure is too heavy at 10 lbs.	and interior is 5 pounds maximum. (CA T24 1133B.2.5, ADA 4.13.11(2)(a) & (b)) p. 201
Client lobby	Drinking Fountain Is not in alcove and projects 18" into passageways. Drinking Fountain does not have wing walls and does not have a textured floor path.	<p>Protruding objects in alcoves can not project more than 4" into walls, corridors, passageways, or aisles. (CA T24 1117B.1.3) p 232</p> <p>If it would create an unreasonable hardship, the water fountain may project into the path of travel under the following conditions:</p> <p>The floor path shall be textured to be identifiable by a blind person using a cane. The minimum textured area shall extend from the wall supporting the water fountain to 12" beyond the front edge of the water fountain and 12" beyond each side of the water fountain., or</p> <p>Wing walls project from the supporting wall at least as far as the water fountain to within 6" of the surface of the path of travel with a min. 32" clearance between the walls." (CA T24 1117B.1.3) pp 232-233</p> <p>The clear knee space between the bottom of the apron and the floor or ground not less than 27" in height, 30" in width, and 8" in depth. (CA T24 1117B.1.2, ADA 4.15.5(1)) p 231</p>

Men's Restroom	Door pressure too high at 10 lbs.	Force to open doors, exterior and interior is 5 pounds maximum. (CA T24 1133B.2.5, ADA 4.13.11(2)(a) & (b)) p 201
Women's Restroom	Door pressure too high at 8 lbs.	Force to open doors, exterior and interior is 5 pounds maximum. (CA T24 1133B.2.5, ADA 4.13.11(2)(a) & (b)) p 201

Facility Location: 145 E. Ridgecrest, Ridgecrest, CA 93555

Facility Element	Findings	Corrective Action
Parking	Sign height too low at 66".	Sign height shall be 80" minimum from bottom of sign to top of finish grade. (CA T24 1129B.4.1, ADA 4.6.5) p. 134
Exterior entrance	Main entrance door pressure too high at 9 lbs.	Force to open doors, exterior and interior is 5 pounds maximum. (CA T24 1133B.2.5, ADA 4.13.11(2)(a) & (b)) p. 201
Client lobby	Accessible counter too high at 46".	Height of accessible tables or counters is between 28" – 34" from floor finish. (CA T24 1122B.4, ADA 4.32.4) p. 388
Unisex Restroom	Accessible signage too high at 60" from bottom.	Door sign and wall sign shall be 60" above the floor to the center line of sign. For permanent identification, the sign shall be installed on the wall adjacent to latch outside of door. If there is no

		<p>space, including at double leaf doors, the sign shall be placed on nearest adjacent wall, preferably on the right. (CA T24 1117B.5.7, ADA 4.30.6) p. 281</p> <p>Raised characters shall be raised 1/32" minimum and shall be Sans Serif upper case characters accompanied by Grade 2 Braille. (CA T24 1117B.5.5.1, ADA 4.30.4) p. 282</p>
	<p>Toilet protector too high at 46" at operable part, and mirror too high at 47" from bottom.</p>	<p>If towel, sanitary napkins, waste receptacles, and other similar dispensing and disposal fixtures are provided, at least one of each type is located with all operable parts, including coin slots, at a maximum height of 40". (CA T24 1115B.8.3, ADA 4.23.7) p. 294</p>

Facility Location: 100 E. California Avenue, Bakersfield, CA 93307

Facility Element	Findings	Corrective Action
Entrance	<p>Door pressure on the interior double door is too high at 9 & 12 lbs. (Outside double doors are automatic doors).</p>	<p>Force to open doors, exterior and interior is 5 pounds maximum. (CA T24 1133B.2.5, ADA 4.13.11(2)(a) & (b)) p. 201</p>

	Door pressure at (Children's Entrance) double doors too high at 20 lbs.	Force to open doors, exterior and interior is 5 pounds maximum. (CA T24 1133B.2.5, ADA 4.13.11(2)(a) & (b)) p. 201
Women's Restroom	<p>Door pressure too high at 9 lbs.</p> <p>Counter height too high at 35".</p> <p>Soap dispenser too high at 45".</p>	<p>Force to open doors, exterior and interior is 5 pounds maximum. (CA T24 1133B.2.5, ADA 4.13.11(2)(a) & (b)) p. 201</p> <p>Sink is mounted with a counter or rim no higher than 34". (CA T24 1115B.4.7.1, ADA 4.24.2) p. 342</p> <p>If towel, sanitary napkins, waste receptacles, and other similar dispensing and disposal fixtures are provided, at least one of each type is located with all operable parts, including coin slots, at a maximum height of 40". (CA T24 1115B.8.3, ADA 4.23.7) p. 294</p>
Men's Restroom	Soap dispenser too high at 47".	If towel, sanitary napkins, waste receptacles, and other similar dispensing and disposal fixtures are provided, at least one of each type is located with all operable parts, including coin slots, at a maximum height of 40". (CA T24 1115B.8.3, ADA 4.23.7) p. 294

V. PROVISION FOR SERVICES TO APPLICANTS AND RECIPIENTS WHO ARE NON-ENGLISH-SPEAKING OR WHO HAVE DISABILITIES

Counties are required by Division 21 to ensure that effective bilingual/interpretive services are provided to serve the needs of the non-English-speaking population and individuals with disabilities without undue delays. Counties are required to collect data on primary language and ethnic origin of applicants/recipients (identification of primary language must be done by the applicant/recipient).

Using this information, a county may determine 1) the number of public contact staff necessary to provide bilingual services, 2) the manner in which they can best provide interpreter services without bilingual staff and 3) the language needs of individual applicants/recipients. Counties must employ an appropriate number of certified bilingual public contact employees in each program and/or location that serves a substantial number of non-English-speaking persons. In offices where bilingual staff are not required because non-English-speaking persons do not represent a substantial number, counties must provide effective bilingual services through interpreter or other means.

Counties must also provide auxiliary aids and services, including Braille material, taped text, qualified interpreters, large print materials, telecommunication devices for the deaf (TDD's), and other effective aids and services for persons with impaired hearing, speech, vision or manual skills. In addition, they must ensure that written materials be available in individuals' primary languages when the forms and materials are provided by CDSS, and that information inserted in notices of action (NOA) be in the individuals' primary language.

A. Findings from Program Manager Surveys, Staff Interviews and Case File Reviews

Question	Yes	No	Some-times	Comments
Does the county identify a client's language need upon first contact? How?	X			Workers identify a clients language needs upon first contact by using the "Language Cards."
Does the county use a primary language form?	X			Kern DHS uses the Form KCDHS 439.
Does the client self-declare on this form?	X			
Are non-English- or limited- English-speaking clients provided bilingual services?	X			

Question	Yes	No	Some-times	Comments
After it has been determined that the client is limited-English or non-English speaking, is there a county process for procuring an interpreter?	X			Workers stated they would access the certified worker list or use the language line.
Is there a delay in providing services?		X		
Does the county have a language line provider, a county interpreter list, or any other interpreter process?	X			
Are county interpreters determined to be competent?	X			Personnel certify bilingual staff through a process that tests verbal, reading and writing skills.
Does the county have adequate interpreter services?	X			
Does the county allow minors to be interpreters? If so, under what circumstances?		X		Workers stated they do not allow minors to be interpreters except in extenuating circumstances, and then only temporarily.
Does the county allow the client to provide his or her own interpreter?	X			
Does the county ensure that the client-provided interpreter understands what is being interpreted for the client?	X			
Does the county use the CDSS-translated forms in the clients' primary languages?	X			

Question	Yes	No	Some-times	Comments
Is the information that is to be inserted into NOA translated into the client's primary language?	X			
Does the county provide auxiliary aids and services, TDD's and other effective aids and services for persons with impaired hearing, speech, vision or manual skills, including Braille material, taped text, large print materials.			X	The Family Services Office at the 100 E. California Avenue Building in Bakersfield did not have the Pub 13 available in large print (English and Spanish), audiocassette and Braille.
Does the county identify and assist the client who has learning disabilities or a client who cannot read or write?	X			
Does the county offer screening for learning disabilities?	X			The Welfare to Work Program has screening for learning disabilities.
Is there an established process for offering screening?	X			The Welfare to Work Program has screening for learning disabilities.
Is the client identified as having a learning disability referred for evaluation?	X			

B. Corrective Actions

Area of Findings	Corrective Actions
Auxiliary Aids	Kern County Department of Human services shall ensure the availability of auxiliary aids and services to persons who are deaf or hearing impaired, or persons with impaired

Area of Findings	Corrective Actions
	speech, vision or manual skills where necessary to afford such persons an equal opportunity to access program services. Div 21-115.41

VI. DOCUMENTATION OF APPLICANT/RECIPIENT CASE RECORDS

Counties are required to ensure that case records document applicant's/recipient's ethnic origin and primary language, the method used to provide bilingual services, information that identifies an applicant/recipient as disabled, and an applicant's/recipient's request for auxiliary aids and services.

A. Findings from Case File Reviews and Staff Interviews

Documented Item	Children's Services	CalWORKs & Employment Services	Non-Assistance CalFresh
Ethnic origin documentation	CMS/CWS Identification Page.	SAWS 1	SAWS 1
Primary language documentation	CMS/CWS Identification Page.	SAWS 1; KCDHS 439	SAWS 1; KCDHS 439
Method of providing bilingual services and documentation	Documented in CMS/CWS	KERN DHS continues to have good documentation. However it is clear the prepared language did not always match the actual statement on how bilingual services were provided.	KERN DHS continues to have good documentation. However it is clear the prepared language did not always match the actual statement on how bilingual services were provided.
Client provided own interpreter	Documented in CMS/CWS	Found documentation showing client provided own	Found documentation showing client provided own

Documented Item	Children's Services	CalWORKs & Employment Services	Non-Assistance CalFresh
		interpreter.	interpreter.
Method to inform client of potential problem using own interpreter	Documented in CMS/CWS	Found documentation showing the form KCDHS 440 informing the client.	Found documentation showing the form KCDHS 440 informing the client.
Release of information to Interpreter	Would be in CMS/CWS Did not find in sample cases.	Form KCDHS 440	Form KCDHS 440
Individual's acceptance or refusal of written material offered in primary language	Would be in CMS/CWS Did not find in sample cases.	Form KCDHS 439	Form KCDHS 439
Documentation of minor used as interpreter	Would be in CMS/CWS Did not find in sample cases.	No documentation in case samples.	No documentation in case samples.
Documentation of circumstances for using minor interpreter temporarily	Would be in CMS/CWS Did not find in sample cases.	No documentation in case samples.	No documentation in case samples.
Translated notice of actions (NOA) contain translated inserts	N/A	Provided as needed on Spanish NOA's	Provided as needed on Spanish NOA's
Method of identifying client's disability	Would be in CMS/CWS Did not find in sample cases.	Form KCDHS 439	Form KCDHS 439
Method of documenting a client's request for auxiliary aids and services	Would be in CMS/CWS Did not find in sample cases.	Form KCDHS 439	Form KCDHS 439

B. Corrective Actions

None

VII. STAFF DEVELOPMENT AND TRAINING

Counties are required to provide civil rights and cultural awareness training for all public contact employees, including familiarization with the discrimination complaint process and all other requirements of Division 21. The training should be included in orientation, as well as the continuing training programs.

A. Findings

Interview questions	Yes	No	Some-times	Comments
Do employees receive continued Division 21 Training?	X			
Do employees understand the county policy regarding a client's rights and procedure to file a discrimination complaint?	X			
Does the county provide employees Cultural Awareness Training?	X			
Do the CSW's have an understanding of MEPA (Multi-Ethnic Placement Act)?	X			
Do the employees seem knowledgeable about the predominant cultural groups receiving services in their area?	X			

B. Corrective Actions

None

C. Special Note:

The reviewer has noted the positive feed back she received from workers regarding the Civil Rights Training conducted by Mike Nisser, Administrative Coordinator Human Resources to be interesting, informative and helpful.

VIII. DISCRIMINATION COMPLAINT PROCEDURES

Counties are required to maintain a process for addressing all complaints of discrimination. They must track complaints of discrimination through the use of a control log in which all relevant information is kept, including when the complaint was received, the name of the complainant, identifying numbers and programs, basis of discrimination, and resolution. It is usually the Civil Rights Coordinator responsibility to maintain this log.

A. Findings from Staff Interviews and Program Manager Surveys

Interview and review areas	Yes	No	Some-times	Findings
Can the employees easily identify the difference between a program, discrimination, and a personnel complaint?	X			
Did the employees know who the Civil Rights Coordinator is?			X	Several CalFresh workers were unable to identify who their Civil Rights Coordinator is.
Did the employees know the location of the Civil Rights poster showing where the clients can file a discrimination complaint?	X			
When reviewing the complaint log with the Civil Rights Coordinator, was it complete and up to date?	X			

B. Corrective Action

Element	Corrective Action
Civil Rights Coordinator	Kern County Department of Health & Human Services shall ensure that staff is knowledgeable regarding contact information of the civil rights coordinator, at minimum, where the information can be located. Div. 21-117 and 21-107.21

IX. CIVIL RIGHTS COMPLIANCE PLAN REVIEW AND APPROVAL

The Kern County Department of Health & Human Services Civil Rights Compliance Plan for the period April 1, 2010 through March 31, 2011, was received on April 29, 2010. It is approved as submitted.

X. CONCLUSION

The CDSS reviewer found the Kern County Department of Health & Human Services staff warm, welcoming, informative and very supportive. Particular thanks to Ginny Krebs, Civil Rights Coordinator, Cari Drake, Assistant Program Director for organizing the details of the review, and to Mike Nisser, Administrative Coordinator, who assisted in the facility reviews. In each District Office, staff was very helpful with the facility review, case reviews, and computer assistance.

The CDSS found the Kern County Department of Human Services in substantial compliance with CDSS Division 21 Regulations, and other applicable state and federal laws. County staff continues to reflect a commitment similar to that expressed by management with respect to ensuring access, assistance, and compliance.

The Kern County Department of Human Services must remedy the deficiencies identified in this report by taking corrective actions. A corrective action plan must be received by CDSS within 60 days of the date of the cover letter to this report; and the plan must include a schedule of all actions that will be taken to correct the deficiencies, and an indication of who will be responsible for implementing the corrective action.

It is our intent that this report be used to create a positive interaction between the county and CDSS in identifying and correcting compliance violations and to provide the county with an opportunity to implement corrective action to achieve compliance with Division 21 regulations. Civil Rights staff is available to provide technical assistance as requested.